REMARKS/ARGUMENTS

Applicant thanks the Examiner for his careful review of this application. Claims 12-22 have been rejected. Claims 13-16 and 18 have been amended. Applicant respectfully requests reconsideration of the application in view of the above amendment and the following remarks submitted in support thereof.

Refusal to Enter Replacement Figures and Accompanying Amendments to the Specification

The Examiner refuses to enter replacement Figures 3 and 4 and the accompanying amendments to the specification submitted in the Amendment mailed January 12, 2004. Although the Applicant believes that no amendment is required as the specification adequately describes the claimed invention, the Applicant amended the specification and offered replacement drawings to assist the Examiner to better understand the claimed invention. Furthermore, the replacement figures and amendments to the specification are clearly supported in the original description. For instance, Figure 3 identically mirrors the paragraph beginning at page 5, line 6, and the Applicant merely amended the paragraph to include reference numbers such that the Examiner will be able to more easily identify the elements discussed in the paragraph. Furthermore, Figure 4 and the added paragraph beginning at page 6, line 7 merely rephrase passages in the specification and claims and, in accordance with M.P.E.P. §2163.07, are not new matter. Accordingly, the Applicant respectfully requests the Examiner to enter the Amendment mailed January 12, 2004.

Rejections under 35 U.S.C. §112, First Paragraph

The Examiner rejected claims 12-22 under 35 U.S.C. §112, first paragraph as containing subject matter which was not described in the specification in such a way as to

enable one skilled in the art to make and to use the invention. The Applicant respectfully

traverses and believes that the subject matter is described in the specification in such a way as

to enable one skilled in the art to make and to use the invention. In particular, the test of

enablement is determining whether any person skilled in the art can make and use the

invention without undue experimentation (see M.P.E.P. §2164.01). As discussed previously,

reference is made to the exemplary source code to implement an embodiment of the

invention, as listed on pages 13-20 in the detailed description, with step-by-step explanation

of the source code. A software application is made from a collection of source codes. Thus,

the source code enables the software application. The fact that the exemplary source code is

set forth in the specification easily enables one skilled in the art to use parts of and copy the

exemplary source code to implement exemplary embodiments of the claimed invention. One

skilled in the art hardly has to conduct any experimentation as the source code attests an

embodiment of the claimed invention as reduced to practice. As a result, the exemplary

source code listed in the specification enables one skilled in the art to make and use the

claimed invention without undue experimentation.

The Applicant further directs the Examiner to: page 4, lines 10-12; page 6, lines 1-5;

page 10, lines 14-16 in the detailed description for support of a deployment descriptor, as

defined in claims 12 and 18. Furthermore, reference is made to the exemplary source code

with step-by-step explanation to implement the deployment descriptor, beginning on page 19,

line 16 and ending on page 30, line 8 in the detailed description. Specifically, the detailed

description structures the exemplary source code of the deployment descriptor by describing

each element of the deployment descriptor. For example, explanations and exemplary source

code for a root element (i.e., connector element as defined in claim 19) of the deployment

descriptor are disclosed from page 19, line 20 through page 20, line 11. With regard to a

deployer for deploying the resource adapter based on properties defined in the deployment descriptor as defined in claims 1 and 18, reference is made to an exemplary source code to implement deployment, beginning on page 13, line 18 through page 18, line 16.

Additionally, with regard to configuring the resource adapter in the target operational environment to create a connection to an instance of the EIS as defined in claim 13, reference is made to: page 7, lines 8-16; page 10, lines 3-16; and pages 13-14. Explanations and exemplary source code for configuring security in the target operational environment as defined in claim 15 are disclosed from page 27, line 14 through page 30, line 8. With regard to packaging interfaces, implementation classes, utility classes, native libraries, and descriptive meta information into the resource adapter as defined in claim 16, reference is made to page 2, lines 15-22 and page 4.

Thus, the Applicant submits that claims 12-22 are patentable under 35 U.S.C. §112, first paragraph because the above-referenced terms defined in claims 12-22 have clear support in the description, with exemplary source code, such that one skilled in the art can easily make and use the claimed invention without undue experimentation. The Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. §112, first paragraph rejection.

Rejections under 35 U.S.C. §112, second paragraph

The Examiner also rejected claims 12-22 under 35 U.S.C. §112, second paragraph as being indefinite for failing to particularly point out and distinctly claim the subject matter. Specifically, the Examiner notes that the scope of claim 12 is not clear as to the meaning of deploying the resource adapter into a target operational environment. Again, the Applicant directs the Examiner to page 13, line 18 through page 18, line 16. Further, dependent claims 13-15 and 19-21 further define deploying the resource adapter.

Finally, the Examiner also rejected claim 16 because the term "method operation" as defined is not clear. Although the Applicant believes that the claims are clearly defined, in an effort to provide more clarity, the Applicant has amended claims 13-16. Furthermore, the Applicant has amended claim 18 to correct the antecedent basis mistake. Accordingly, in view of these amendments and remarks, the Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. §112, second paragraph rejection.

Anticipation Rejections under 35 U.S.C. §102(a)

The Examiner has rejected independent claims 12 and 18 under 35 U.S.C. §102(a) as being anticipated by U.S. Patent No. 6,687,745 to Franco et al. For the reasons put forth below, Applicant respectfully asserts that Franco et al. fail to identically disclose each and every feature specified in independent claims 12 and 18.

Independent claims 12 and 18 define a method and a system to provide a resource adapter that collaborates with an application server to provide services offered by an enterprise information system. In the method of claim 12, a deployment descriptor is packaged into the resource adapter. Thereafter, the resource adapter is deployed into a target operational environment based on properties defined in the deployment descriptor. Similarly, the system of claim 18 includes a connector provider to create the resource adapter, whereby the connector provider specifies the deployment descriptor in the resource adapter. The system also includes a deployer to deploy the resource adapter into the target operational environment based on properties defined in the deployment descriptor.

In support of the 35 U.S.C. §102(a) rejection, the Examiner notes that Franco et al. teach the resource adapter that collaborates with the application server to provide services offered by the enterprise information system, as defined in claims 12 and 18. Applicant respectfully traverses the Examiner's characterization of Franco et al. relative to claims 12

and 18 because <u>Franco et al</u>. do not teach the enterprise information system. Specifically, the Examiner failed to particularly specify the portions of <u>Franco et al</u>. that teach the enterprise information system. In fact, the term "enterprise information system" is not disclosed anywhere in <u>Franco et al</u>. Accordingly, <u>Franco et al</u>. cannot reasonably be considered to teach the enterprise information system, as defined in claims 12 and 18.

The Examiner also failed to specify the portions of <u>Franco et al</u>. that teach the connector provider that creates the resource adapter, as defined in claim 18. The term "connector provider" is not disclosed anywhere in <u>Franco et al</u>. Accordingly, <u>Franco et al</u>. cannot reasonably be considered to teach the connector provider, as defined in independent claim 18.

Moreover, the Examiner also notes that <u>Franco et al</u>. teach deploying the resource adapter into the target operational environment based on properties defined in the deployment descriptor, as defined in claims 12 and 18. Applicant respectfully traverses the Examiner's characterization of <u>Franco et al</u>. relative to claims 12 and 18 because the portions of the reference relied upon by the Examiner (col. 29, lines 8-56) do not teach deploying the resource adapter into the target operational environment, as defined in claims 12 and 18. In particular, the Examiner notes that the resource adapter is identical to a memory disclosed in <u>Franco et al</u>. and that the target operational environment is identical to an application server disclosed in <u>Franco et al</u>. (see Office Action mailed February 13, 2004 at page 4). In this case, claim 12 defines deploying the resource adapter into the target operational environment. Thus, according to the Examiner's assertions, for <u>Franco et al</u>. to teach the claimed invention, <u>Franco et al</u>. must teach that the memory is deployed into the application server. However, <u>Franco et al</u>. actually teach "droplet-enabled applications are deployed" – not memories (col. 29, line 6). Furthermore, the Applicant asserts that deploying a memory into an application

server is simply illogical and unworkable. Accordingly, Franco et al. cannot reasonably be considered to teach deploying the resource adapter into the target operational environment based on properties defined in the deployment descriptor, as defined in claims 12 and 18.

The Examiner also notes that Franco et al. teach the method of packaging the deployment descriptor into the resource adapter, as defined in claim 12. Applicant respectfully traverses the Examiner's characterization of Franco et al. relative to claim 12 because the portions of the reference relied upon by the Examiner (col. 29, lines 10-56) do not teach deploying the resource adapter into the target operational environment, as defined in claim 12. Specifically, in addition to equating a memory with a resource adapter, the Examiner also asserts that the resource adapter is identical to dynamically loadable libraries as disclosed in column 29, line 7 of Franco et al. The Examiner also notes that the downloading of droplet-enabled applications as disclosed in column 29, lines 10-56 of Franco et al. teaches packaging the deployment descriptor. First, the term "downloading" as disclosed in Franco et al. cannot reasonably be considered to teach the term "packaging" as defined in claim 12. Secondly, claim 12 defines packaging the deployment descriptor into the resource adapter. Therefore, according to Examiner's assertions, for Franco et al. to teach the claimed invention, Franco et al. must teach that the droplet-enabled applications are downloaded into the dynamically loadable libraries. However, Franco et al. actually disclose that "droplet-enabled applications are deployed as dynamically loadable libraries" (col. 29, lines 6-7). Thus, Franco et al. disclose that droplet-enabled applications are dynamically loadable libraries. Since droplet-enabled applications are dynamically loadable libraries, the droplet-enabled applications cannot be downloaded into itself. Downloading applications into itself is simply illogical and unworkable. Accordingly, Franco et al. cannot reasonably

be considered to teach packaging the deployment descriptor into the resource adapter, as defined in independent claim 12.

As Franco et al. fail to teach each and every element of the claimed invention, the Applicant respectfully submits that independent claims 12 and 18 are patentable under 35 U.S.C. § 102(a) over Franco et al. Accordingly, the Applicant respectfully requests the Examiner to withdraw the 35 U.S.C. § 102(a) rejections for claims 12 and 18.

Obviousness Rejections under 35 U.S.C. §103(a)

Dependent claims 13-17 and 19-22 stand rejected under 35 U.S.C. §103(a) as being unpatentable over Franco et al. In support of the 35 U.S.C. §103(a) rejection, the Examiner notes that Franco et al. teach or suggest the claimed invention as claimed in dependent claims 13-17 and 19-22. As the reasons discussed above, Franco et al. do not disclose each an every feature of independent claims 12 and 18. The Applicant also respectfully traverses the Examiner's characterization of Franco et al. relative to dependent claims 13-17 and 19-22 because the portion of the reference relied upon by the Examiner (col. 14, lines 16-30) does not teach or suggest the claimed invention as defined in claims 13-17 and 19-22.

Specifically, column 14, lines 16-30 merely discloses "features and functions on the desktop of the client computer" (col. 14, lines 14-15). Features and functions of the desktop includes branding of droplets, tracking droplet dispersion information, providing an ubiquitous event channel, mirroring desktop to webtop, etc. (col. 14, lines 16-30). Features of a desktop and providing a resource adapter that collaborates with an application server to provide services offered by an enterprise information system involve entirely different technologies and applications. Column 14, lines 16-30 of Franco et al. do not teach or suggest configuring the resource adapter in the target operational environment to create a

connection to an instance of the enterprise information system, configuring application server mechanisms for transaction management, configuring security in the target operational environment, connector contracts between the connector provider and the deployer, declarative information enabling the deployer to deploy the resource adapter into the target operational environment, etc. as defined in claims 13-17 and 19-22.

Instead of supporting the Examiner's assertion with adequate evidence, the Examiner notes that "[w]what types of programs (properties defined in the deployment descriptor) being loaded is a matter of design-choice ... It would have been obvious to a person of ordinary skill in the art to load those programs required by client so as to provide proper services to the client" (see Office Action mailed February 13, 2004 at page 4). As the teachings of Franco et al. have nothing to do with the problems associated with providing a resource adapter that collaborates with an application server to provide services offered by an enterprise information system, the Applicant respectfully traverses the Examiner's reliance on common knowledge, and asks the Examiner to specify each portion of Franco et al. that particularly teach or suggest each *element* of the claimed invention or provide other documentary evidence (see M.P.E.P §2144.03). Accordingly, Franco et al. do not raise a prima facie case of obviousness against any of dependent claims 13-17 and 19-22 and, as such, the obviousness rejections of claims 13-17 and 19-22 are improper and should be withdrawn.

Conclusion

In view of the foregoing, the Applicant respectfully submits that all the pending claims 12-22 are in condition for allowance. Accordingly, a Notice of Allowance is respectfully requested. If the Examiner has any questions concerning the present Amendment, the Examiner is requested to contact the undersigned at (408) 749-6900 ext.

6924. If any additional fees are due in connection with filing this Amendment, the

Commissioner is also authorized to charge Deposit Account No. 50-0805 (Order No.

SUNMP148). A duplicate copy of the transmittal is enclosed for this purpose.

Respectfully submitted,
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